# UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT REDDING FIELD OFFICE

# CATEGORICAL EXCLUSION DOCUMENTATION

Carr Fire Emergency Stabilization
NEPA DOC#: DOI-BLM-CAN060-2018-0040-CX

General Location:

BLM administered land in Shasta and Trinity Counties within the.

Carr Fire perimeter

Legal Location:

See attached map.

# A. Description of Proposed Action, including any Stipulations

### Background

The Carr Fire began July 23, 2018 at approximately 1:15 pm from a suspected vehicle mechanical failure. The fire origin was within Whiskeytown National Recreation Area (NRA) and spread on to lands administered by the Bureau of Land Management (BLM) and Forest Service (USFS) in subsequent days. Extreme fire behavior occurred on July 28 and 29, when the fire burned to the east into Redding, California, driven by strong winds and plume dominated fire behavior. The Carr Fire destroyed 1,079 residences, 22 commercial structures, and 503 outbuildings, and damaged an additional 277 structures. The fire was managed under Unified Command between CAL FIRE, the Shasta-Trinity National Forest, and Whiskeytown NRA. At the time of containment on September 4, 2018, the fire had covered 229,651 acres, of which 63,847 acres are BLM-managed. The Carr Fire burned across wide ecological gradients, and through previous fire scars from the 2004 French Fire, 2008 Motion Fire, and 2008 Whiskeytown Complex. These previously burned areas were dominated by shrub communities, which largely experienced stand replacement in the Carr Fire. Plant communities affected by the fire include chaparral fields (e.g., manzanita, ceanothus, and chamise); gray pine/knobcone pine/oak forests; mixed conifer forests; and upper montane forests at the highest elevations. The current fire area was dominated by low and moderate soil burn severity and vegetation mortality. Fire behavior moderated when previous fuels treatments were intersected, particularly in mixed conifer forest communities. Due to the size and extreme nature of this fire, an interagency Burned Area Emergency Response (BAER) Team was deployed on July 28, 2018 to conduct rapid assessments to identity values at risk and prescribe emergency stabilization (ES) recommendations.

#### **Description of Proposed Actions**

The Redding Field Office (RFO) is proposing stabilization and restoration in areas affected by the Carr Fire. The purpose and need for the proposed actions are to protect life and property from unstable landscapes that were created by the Carr Fire. The primary values at risk that were identified for BLM administered lands were: transportation infrastructure, Swasey Sediment Basin, recreational infrastructure, critical cultural resources, and critical natural resources. The

BAER Team provided a suite of treatment measures recommended to address the values at risk. Based upon those recommendations and follow up field visits by BLM staff, the BLM RFO is proposing actions outlined in the Emergency Stabilization (ES) Plan and listed below.

#### Watershed

Storm Patrol/Road Debris Removal/Culvert Cleanout

There are many BLM roads and road-stream crossings within the fire perimeter at risk of inundation, debris deposition, culvert plugging, flood damage and other post-fire related impacts from elevated flows carrying sediment and debris. These areas would be monitored and assessed for any potential damage to the roads and infrastructure such as culvert plugging and stream diversions onto the road surface. Other values at risk (buildings, water supply facilities, diversion structures, etc.) adjacent to channels would be assessed during this monitoring in order to avoid impacts in subsequent storm events. Debris would be stabilized in the adjacent area. In the event there is a significant amount of debris that is unable to be stabilized on site, heavy equipment could be required to stabilize the material off site. This activity would utilize existing roads.

Swasey (Middle Creek) Sediment Basin Cleanout

Sediment and debris would be removed from the Swasey (Middle Creek) Sediment Basin prior to fall rainfall events to maximize storage capacity. Following major storm events, debris and sediment fill would be removed to maintain storage capacity of the sediment basin. The work would occur in the fall of 2018 for initial clean out for subsequent years through 2022 using an excavator or other similar heavy equipment. Materials would be evaluated to ensure it does not contain excessive levels of ash or contaminants resulting from the Carr fire runoff, making recycling impractical. The material could be hauled in dump trucks or other similar equipment to a nearby aggregate plant for recycling if contaminant levels were acceptable. If this material is impractical to recycle, it would then be hauled to an approved landfill. This activity would utilize existing roads.

Soil stabilization on BLM land adjacent to private property

In order to respond to the requests of adjacent private property owners, a limited scope of soil stabilization would be allowed on BLM land. This work would be completed by the private property owner in order to protect values at risk on their private land. The limited scope of work includes: installing straw wattles and straw bales within 300 ft of the property line and spreading straw or wood mulch (wood chips) within 100 feet of the property line. All straw must be certified weed free or rice straw. Any stabilization activity outside of this scope would be analyzed in a separate NEPA analysis.

# **Cultural**

Archaeological Site Condition Assessments, Stabilization Site Monitoring
Archaeological Site Condition Assessments and site monitoring would be conducted at archaeological sites within the fire perimeter to assess potential damage to cultural resources from post-fire effects and quickly identify, address, and deter illegal looting activities.

Treatments would be prescribe for the emergency stabilization and rehabilitation of sites and structures to prevent adverse effects from post-fire erosion and other fire related effects and impacts. These activities would be performed by BLM archaeologists with a high level of ecological and cultural integrity as described in the "Archaeological Site Stabilization" activity.

Archaeological Site Stabilization

The Carr Fire BAER assessment has identify multiple pre-contact and historic era sites that require post fire stabilization treatments. The sites being proposed for stabilization treatments contain significant fragile resources where hazard tree removals, and fencing is needed to mitigate further damage to cultural resources managed by the BLM RFO. Rehab actions include removal of hazard trees within the perimeter and/or immediate vicinity of significant cultural features and archaeological sites that have the potential to adversely affect cultural resources when they ultimately fall. The trees also pose a risk to archaeological personnel conducting site assessments and monitoring activities. Tree removal would follow protocol listed in the *Hazard Tree Mitigation* section of this document. Repair of existing exclusionary fencing damaged to reduce unwanted pedestrian and vehicular access and reduce looting potential. Existing educational and interpretive signage would be replaced. All proposed on-site treatments would be undertaken after consultation with local Native American tribes has been completed.

#### Charlie Brownstein Grave Stabilization

Stabilize post-fire effects at the Charley Brownstein Gravesite (CA-030-367). The gravesite is a highly visible, historic (1864) period infant burial, located on BLM land, that represents the last evident gravesite of the Shasta Hebrew Congregation Jewish Cemetery established in 1857. The French drain and replacement of the railroad tie border around the grave would provide greater erosion protection for the gravesite. The removal of hazard trees, reconstruction of footpath handrail, steps, and railroad tie border, and construction of a rock lined French drain at the base of the stairs and slope would help to provide public safety and mitigate further damage to a significant site managed by the BLM RFO. A professional archaeologist would be present during erosion control actions to mitigate impacts to the site. All proposed on-site treatments would be undertaken after consultation with the local Jewish community has been completed.

# Abandoned Mine Lands (AML)

Short Term AML Safety Fencing

Hazardous mine features that were discovered or made more visible by the Carr Fire would be mitigated with temporary t-post fencing and signs until permanent closures can be put into place. This activity would include Section 106. Fencing standards would be adopted from Nevada Division of Minerals' "Minimum Standards for Fences Built Around Mine Shafts<sup>1</sup>," and consist of 4 barbed wires attached to the t-posts with a mine hazard warning sign. Adits at a minimum would require two t-posts at the front of the portal, while shaft fencing would surround the entire feature. Temporary closures would be checked routinely to ensure they are still standing, and would not be in place for more than one year. Permanent mitigation for hazardous mine features would be addressed in a separate NEPA document(s).

#### Recreation Trails

Safety Barriers

Installation of boulders, gates, and fencing to act as barriers where vegetation burned by the fire no longer prohibits vehicle passage to power lines, trailheads, accesses roads, and similar locations. These actions are needed to provide for public safety on these heavily used trails and keep use to existing routes.

<sup>1</sup> http://minerals.nv.gov/Programs/AML/Hazard Info/

Trail Infrastructure Repair and Increased Maintenance

Many culverts and several bridges have burned, creating a human safety hazard. Similarly, sections of trail tread have collapsed in places where roots and stumps have burned out. All need to be mitigated to provide for public safety on these heavily used trails. Culverts would be replaced or removed and converted to rocked crossings. Bridges would be replaced. In some areas, where these actions cannot be feasibly achieved or completed in a timely manner, a minor trail re-route would be utilized. Additionally, in areas where erosion post-fire damages part of the trail, a minor re-route may be considered. These re-routes would be designed to encompass the minimum length possible (generally less than 100 ft. in length) while avoiding the hazard and re-establishing the trail. Before these re-routes are established, coordination with the RFO interdisciplinary team would occur to approve the minor changes to trail location. In areas where suppression activities affected the trail tread, the tread would be re-established as close as possible to the same location as its location pre-fire. Ongoing post-fire affects would continue to cause an increased level of damage to trails for several years following the fire – expected increases in normal windfall, drainage concerns, rock fall and tread issues, increased brushing needs, etc. This activity would be covered under our current Trail Maintenance CX and would adhere to activities included in that plan (DOI-BLM-CA-N060-2018-0010-CX).

# Signs

Warning signs serve to inform the visiting public of increased safety risks when entering a burned area, such as threats of flash floods, debris flows, tree hazards, rock fall, etc. Warning signs would be placed at key locations along roads and trails – trailheads, road junctions, visitor gathering locations, etc. Signs which existed before the fire which burned or damaged would be replaced. This includes larger trailhead and recreation area signs, interpretive signs, and carsonite trial markers.

### **Minor Facilities**

Minor Facilities Repair-Iron Mountain road shooting area

The fire burned straw wattles at the Iron Mountain shooting area. These wattles provide erosion control to manage for lead contamination at the site. The burned straw wattles on Sites #1 (75' long) and #3 (120' long) of the BAER Plan would be replaced before fall rains set in.

Minor Facilities Repair - Shasta Guild amphitheater

The Shasta Guild amphitheater was destroyed by the fire. The amphitheater would be replaced in its existing footprint. The burned wooden stage, log barrier, wooden bridge, and straw bales would be rebuilt/replaced or a comparable design using hardened native fill or rock would be rebuilt in the existing footprint. This facility is an important element of the public recreational use of this near-urban area of Redding.

### Tree Hazards

Tree Hazard Mitigation

The Carr fire has created numerous hazard trees along BLM maintained roads, trails and public infrastructure and surrounding private property, creating a significant tree hazard safety issue for the public. Hazard trees are considered trees that will impact a road, trail, infrastructure, or other sensitive resources. The height of a site potential tree varies across the fire area, but is approximated at 150 ft. This is the general "buffer" distance that would be used to determine hazards to roads and trails, unless site characteristics dictate a lower or high buffer distance. For example, when there are steep slopes above a road, the "buffer distance" would increase due to

the potential for trees to roll and slide downhill impacting roads, trails, and infrastructure. Other considerations such as the lean of the tree, undermined or severed root systems, weather, burn severity, and species would be considered when determining hazards. These areas would be analyzed and determined on a case-by-case basis. Proactively cutting these trees before they fall would allow the BLM to better control the impact to safety, infrastructure, and the timing of the removal.

Tree hazard mitigation and removal using a variety of methods would reduce the threat to human life along heavily used recreation trails and the road systems through BLM lands. Options for mitigating tree hazards include hand felling and machine felling. Once the trees are cut, the resulting fuel loading hazard may be dealt with by lop and scatter of the branches, piling for future burning, chipping the branches, chipping the entire tree, or removing the tree with logging equipment when necessary to facilitate public safety. Future burning would be covered in an existing or future NEPA analysis and would conform to the BLM approved burn plan. Commercial sales would be utilized for tree removal when appropriate.

In some areas, public firewood gathering would occur. The public would be required to comply with standard RFO firewood permit conditions such as keeping all vehicles on roads, lop and scatter of all the branches and fine fuels, and following all fire restrictions. The public may cut firewood from trees already felled. Mitigation and removal of hazard trees would be tracked to ensure compliance with the 4,200 acres as detailed in Categorical Exclusion DOI Part 46, 210 (l).

# **Habitat Restoration**

# Revegetation

In localized areas throughout the fire, revegetation would occur to facilitate recovery of natural vegetation and achieve other land management goals such as reducing erosion from disturbed soils, meeting recreation and visual resource management goals, and engaging the community in post-fire recovery efforts. Locations could include around roads, trails, and other recreational facilities, near private property boundaries, in small patches adjacent to waterways, and along utility corridors. Revegetation could include planting acorns, broadcast seeding native seed mixes, and planting seedlings of various native brush, tree, grass, or forb species. Locally appropriate species would be utilized, and locally sourced seed would be utilized where available.

#### Utilities

Local utilities would be stabilizing roads and work areas on or adjacent to rights-of-way (ROWs) where soils have been disturbed due to power line reconstruction activities. In most cases stabilization would be limited to restoring roads authorized through a ROW grant. Restoration would consist of construction or replacement of waterbars or rolling dips to increase infiltration and reduce sediment transport. Outside of ROWs, treatments such as mulching and hydroseeding would be used to increase infiltration, reduce sediment transport and aid in the reestablishment of native plants, where disturbed areas are not part of an existing road associated with an approved ROW. Hydroseeders would be used to apply native seed mixes, along with mulch, fertilizer, and soil binding agents. Hydroseeding would be concentrated in an area of approximately 8 acres, south of the town of Keswick on Redding Electric Utility's Keswick Transmission Loop (ROW CACA 30972). The remaining mulching and road repair would be focused in the area east of Deadwood Gulch (PG&E ROW CACA 17956) where approximately 10 acres would be treated.

# **Project Design Features**

- 1. General: All proposed treatments would comply with all required laws, regulatory approvals would be obtained, and BLM standards and guidelines would be followed. All pertinent resource specialists should be consulted during project implementation (e.g. archeologist, botanist, wildlife biologist, hydrologist, soil scientist, fuels specialist, weeds, forester, and realty). This also applies for treatments to be implemented by a Right-of-Way (ROW) holder, such as a power company or road department, which would have to comply with any existing ROW agreements. BLM RFO would develop and implement a tracking and coordination system in order to ensure all actions carried out under stabilization and rehabilitation included in this CX conform with all PDF's, stipulations, and policy guidance.
- 2. Special Status Species: If previously unknown site of special status species (plant or animal) are discovered during individual project implementation, the species would be identified, flagged, and would be avoided to the maximum extent possible. Buffer zone sizes around sensitive plant sites would be identified at the discretion of a qualified specialist and/or FO Manager.
- 3. Cultural Resources: In the event of inadvertent discovery of, or unanticipated effects to, cultural resources during implementation of a project under this CX the field office Archaeologist, Field Manager, and BLM project manager or lead shall be immediately notified by personnel responsible for project implementation. All project work and activities with the potential to damage the cultural resource shall cease immediately within 200 ft. of the discovery or where the unanticipated effects have occurred. The FO Archaeologist shall make an assessment of the situation and, in consultation with the Field Manager, prescribe a course of action consistent with the Protocol and/or the Section 106 regulations pertaining to post-review discoveries and unanticipated effects. The FO Archaeologist shall document implementation of the agreed-upon steps and shall report the discovery event and the manner of its resolution.
- 4. Recreation Safety and Access: To the extent possible, roads that provide access to developed recreation sites would be used minimally for both safety concerns and potential degradation of access roads. If the use of these roads is necessary for treatment activities, these roads would be avoided during weekends. A recreation planner would be consulted for proposed hazard tree removal in recreation sites or along trails and roads to ensure recreation management objectives are met by proposed treatment.
- 5. Weeds and Invasive Species: Prior to mobilization into a project area, heavy equipment would be steam cleaned or pressure washed to remove soil and other materials that could transport weed seed, root fragments, or other propagative materials. If equipment is removed from the project area during the life of the operations, it must be re-cleaned and re-inspected prior to re-entry into the project area.
- 6. Riparian Protections: Riparian reserves would be defined as 100 ft buffers around intermittent streams, 150 ft buffers around perennial non-fish bearing streams, and 300 ft buffers around perennial fish bearing streams. Culvert cleaning, sediment basin cleaning, and other stabilization activities would occur in the riparian reserves and would have a positive impact on riparian protections. In riparian reserves hazard trees would be felled and left on site in order to augment woody debris in water courses. However, in some areas, log removal in the riparian reserves would be utilized to promote Aquatic Conservation Strategy objectives by reducing vectors for streambank instability (fallen trees disrupting proper road drainage or upheaving soil as a result of blowdown) and catastrophic wildfire (excessive fuel loading).

- 7. Hazard Tree Removal: All equipment operations would occur on existing roads. Any additional log processing (e.g. limbing and bucking to desired lengths) would be accomplished using chainsaws or tracked processing equipment. Log removal would be accomplished using either a self-loading log truck or tracked/rubber tire loader. There would be no ground or habitat disturbance as there would be no road construction off existing road surfaces. Hazard tree removal would occur outside of Northern Spotted Owl nesting season.
- 8. *Monitoring*: Monitoring and assessment of the proposed actions would be carried out as needed to ensure public safety and successful implementation.
- 9. Upon necessity, temporary road and trail closures would be allowed under Categorical Exclusion DOI Part 516 Chp 11: 11.9 G (3): "Temporary closure of roads and trails", in order to safely complete these actions.
- B. Conformance with Land Use Plans, Statutes, and Regulations

#### **Plans**

Redding Resource Management Plan (RMP)/Record of Decision. 1993. This RMP provides the overall direction for managing and allocating public land resources and uses in the Redding Resource Area. Direction for fire management included modified suppression techniques to address specific resource concerns, and recognized the need for prescribed fire and hazard fuel reduction. An addendum to this plan, the Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the Range of the Northern Spotted Owl (1994) (Standards and Guidelines), provides direction for management of these BLM lands for protection of the Northern Spotted Owl and late successional forest.

These actions conform to the Redding Resource Management Plan (RMP) June 1993 Record of Decision general guidance as it "protects regionally significant values" and "responds to public interest in providing future recreation use opportunities" (pg 13). Additionally, it is specifically provided for or is clearly consistent with the Trinity Management Area and Shasta Management Area guidance and objectives as follows:

- Trinity Management Area
  - o Maintain the riparian and fisheries habitat of anadromous fisheries streams
  - o Maintain the existing scenic quality of BLM administered lands
  - o Reduce the sediment load entering the Trinity River via Grass Valley Creek for the improvement of anadromous fisheries
- Shasta Management Area
  - o Maintain special status species habitat
  - o Maintain the existing scenic quality of the area
  - Protect significant historic elements of the French Gulch and Deadwoods mining districts
  - o Enhance existing semi-primitive motorizes recreation opportunities
  - o Conserve and interpret prehistoric and historic archaeological resources on public
  - o Protect the native plan communities and associated fauna of the area
  - o Protect the historic values of the area

The proposed project area is within the boundaries of the Northwest Forest Plan and would be subject to the Standards and Guidelines as outlined in the 1994 Amendment. Surveys and assessments have been completed by the RFO Wildlife Biologist in coordination with US Fish

and Wildlife Service. A "no effects" determination has been reached, concluding that these actions would have no adverse effect on the Northern Spotted Owls or their Critical Habitat.

These actions are further supported by the following BLM RFO Management Plans:

Fire Management Plan (FMP), Redding Field Office. 2014. The Fire Management Plan identifies direction for fire and fuels management of public lands administered by the Bureau of Land management (BLM) within the Redding Field Office of Northern California. The BLM RFO's FMP is to identify and integrate all wildland fire management guidance, direction and activities required to implement Federal Wildland Fire Management Policy and the National Fire Plan.

Interlakes Special Recreation Management Area Record of Decision, Redding Resource Area. 1998. This plan provides multi-agency coordinated management direction for roughly 75,000 acres of public lands in the upper Clear Creek/Shasta Lake area, with a primary focus on improving trail and OHV recreation opportunities and reducing fire hazards.

Swasey Drive Area Implementation Plan, Shasta County California, Redding Field Office. 2004. This plan was developed primarily for the long-term protection of the Swasey Drive cultural resources, and includes direction for other resources of concern including noxious weeds, hazardous fuel loads, and wildlife and fisheries.

# Consultation and Scoping

#### Cultural Consultation

National Historic Preservation Act compliance is met through the Emergency Situations stipulation (section 10) within the 2014 California BLM State Protocol Agreement. Letters describing the actions within this CX initiating consultation with all affected federally recognized Native American Tribes were emailed on August 22, 2018 and sent certified mail on August 30, 2018. This consultation also addresses required consultation under the NHPA Section 106 guidelines. Further consultation in the form of phone calls and meetings occurred during the planning and development of this CX.

#### Sensitive Species Consultation

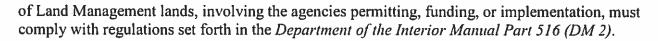
BLM has completed informal consultation with USFWS during late August and early September 2018 and it has been determined that formal consultation is not needed for these actions. Section 7 consultation occurred in regards to the Swasey (Middle Creek) Sediment Basin in 2003.

# Other Scoping

The BLM Interdisciplinary Team has been gathering input from local partners such as the OHV and other recreation groups in the area. Input and communication from our partners in on-going and reflected in our proposed actions.

#### C. Compliance with the National Environmental Policy Act.

These actions are categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with the following Department of Interior BLM specific guidelines. Emergency stabilization and rehabilitation actions proposed on Bureau



# Department of Interior:

Cat Ex DOI Part 46, 46.210 (1):

"Post-fire rehabilitation activities not to exceed 4,200 acres (such as tree planting, fence replacement, habitat restoration, heritage site restoration, repair of roads and trails, and repair of damage to minor facilities such as campgrounds) to repair or improve lands unlikely to recover to a management approved condition from wildland fire damage, or to repair or replace minor facilities damaged by fire. Such activities: Shall be conducted consistent with agency and Departmental procedures and applicable land and resource management plans; Shall not include the use of herbicides or pesticides or the construction of new permanent roads or other new permanent infrastructure; and Shall be completed within three years following a wildland fire."

# Bureau of Land Management:

Cat. Ex: DOI Part 516 Chp 11: 11.9 E (13)

"Amendments to existing rights-of-way, such as the upgrading of existing facilities, which entail no additional disturbances outside the right-of-way boundary."

Cat. Ex: DOI Part 516 Chp 11: 11.9 G (3):

"Temporary closure of roads and trails."

Cat. Ex: DOI Part 516 Chp 11: 11.9 J (8):

"Installation of minor devices to protect human life (e.g., grates across mines)."

# Additional NEPA Compliance:

DOI-BLM-CA-N060-2018-0010-CX, Redding Field Office. 2018. Road, Trail, and Facilities Maintenance Categorical Exclusion Documentation: This document provides necessary compliance to conduct routine road, trails, and facilities maintenance at developed recreation sites on BLM administered lands within the Redding Field Office management area. A variety of routine infrastructure and minor facility maintenance activities are covered through this Categorical Exclusion.

For these actions, scoping was completed internally through coordination with resource specialists. External scoping was accomplished by integration with DOI Burned Area Emergency Response (BAER) Team recommendations and gathering input from representatives from local and tribal partners. I have considered extending public scoping and involvement in the decision making process in order to balance the need for an integrated and open planning approach that also requires timely action to be effective and have concluded the informal scoping detailed above is sufficient.

I considered the impacts the impacts this project would have on public access, soil erosion, sediment delivery to streams, wildlife habitat, cultural resources, and visual resources from nearby recreational areas. The Best Management Practices and Project Design Features described above and incorporated into this project would prevent significant impacts to any of these resources.

D. Signature

Field Manager

CHARLES WRIGHT, ACTING

21 SEPT 2018

Date

E. Contact

For information, contact Patricia Moran, Planning and Environmental Specialist, 530-224-2140.

# **Review of Extraordinary Circumstances**

The Department of the Interior Manual 516 2.3A (3) requires review of the following "extraordinary circumstances" (516 DM 2 Appendix 2) to determine if an otherwise categorically excluded action would require additional environmental analysis/documentation.

1) Have significant impacts on public health or safety.

()Yes (X) No

Comments: Feeling hazard trees along the roads, stabilizing hazards associated with AML sites, and other stabilization activities proposed would have a beneficial impact on public safety. Standard safety precautions taken during these activities, such as road signs and traffic control, would protect the public from negative health or safety impacts during operations.

2) Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas.

()Yes (X) No

Comments: Class III Surveys have been completed by BLM RFO Archaeologist on much of the project area. Due to the emergency nature of this project, it is exempt from SHPO Protocol and "the BLM and its mutual aid partners would implement to the extent prudent and feasible any measures that could avoid or minimize harm to historic properties and shall implement post-emergency rehabilitation measures and evaluations for properties which may have damaged by agency activities during the emergency" (2014 California BLM State Protocol Agreement). Class III Surveys, however, would be completed in all project areas prior to implementation of actions. None of the other special special designations listed are found in the project area or would be impacted by the project.

3) Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA Section 102(2)(E)].

()Yes (X) No

Comments: There are no identified controversial effects or conflicts pertaining to the project.

4) Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks.

()Yes (X) No

Comments: Effects from the project would be easily predicted and understood from past management experience.

5) Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects.

()Yes (X) No

Comments: The project would not set a precedent for future actions.

6) Have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects.

()Yes (X) No

Comments: Partners and land managers surrounding the project area that were also impacted by the fire are likely to be implementing similar activities. Communication through the interagency BAER process and on-going coordination has occurred and it is not likely these actions would constitute a cumulatively significant environmental effect. The BLM RFO will also anticipate doing other post-fire recovery actions which actions are not expected to have significant environmental effects. These actions will be addressed in another NEPA analysis.

7) Have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by either the bureau or office.

()Yes (X) No

Comments: The post-fire stabilization treatments are exemption actions according to 2014 BLM PA Stipulation B1 and B2. Exemption B1: Repair or stabilization of historic properties using in-kind workmanship and materials consistent with Secretary of the Interior's Standards for the Treatment of Historic Properties and that do not have an effect upon the values that make the properties significant. B2: Emergency repair or stabilization of historic properties using methods consistent with Secretary of the Interior's Standards for the Treatment of Historic Properties and that do not have an effect upon the values that make the properties significant. The hazard tree removal would need prior Class III survey before hazard tree removal would occur. Redding Field Office staff would coordinate to designate hazard tree units where new class cultural resources surveys would focus to identify resources for protection. Sites would be avoided from actions when they can and if hazard trees are present within the perimeter or near boundary of an eligible or potentially eligible resources, trees would be directionally felled away from sensitive resources and left on site or cleaned up by hand. The proposed actions would have no effect to his historic properties.

8) Have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat.

()Yes (X) No

Comments: The Northern Spotted Owl is the only Endangered or Threatened species found within the perimeter of the Carr Fire. It is also the only species with Critical Habitat within the fire perimeter. A number of activities are covered by this CX, but the only one with potential to affect the Spotted Owl or its Critical Habitat is the hazard tree removal activity. Disturbance of the owl is not an issue because the hazard tree removal would not be done during the nesting season.

Roads within the Critical Habitat would be treated with hazard tree removal. Brief surveys along these roads indicate that approximately 50% of the miles of road were severely burned, were in forested habitat, and had hazard trees. As a result, a small proportion of the 15,354 acres of Critical Habitat within the Carr Fire perimeter would be treated with hazard tree removal. Nearly all of the hazard tree removal within the Critical Habitat would be along roads on or near ridge lines. Spotted Owl surveys that have been conducted in this area have never detected owls near these ridgeline roads. All detections have been downslope in the drainages, one half mile or more from the affected roads. Given all of these factors, we determine that the hazard tree removal would have no adverse effect on the Northern Spotted Owls or their Critical Habitat.

9) Violate a Federal law, or a State, local, or tribal law or requirement imposed for the protection of the environment.

()Yes (X) No

Comments: It is not anticipated that the proposed action would violate a federal, state, local, or tribal law.

10) Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898).

()Yes (X) No

Comments: It is not anticipated that the proposed action would result in a disproportionately high and adverse effect on said populations.

11) Limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (Executive Order 13007).

()Yes (X) No

Comments: All BLM lands would remain open ceremonial use. In the event of temporary closures for public safety, this would be communicated and coordinated with our tribal partners. These proposed activities would help to protect and restore the physical integrity of sacred sites within the fire perimeter.

12) Contribute to the introduction, continued existence, or spread of noxious weeds or nonnative invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112).

()Yes (X) No

Comments: Project activities are expected to help prevent the spread of noxious weeds or non-native species through native seeding. Additionally, project design features would help prevent the spread of non-native species would be implemented. Noxious weeds and non-native species are expected to increase in the project area as a result of the fire, but treatments to address this increase are analyzed in other NEPA documents.

Redding Field Office Consistency Review of Northwest Forest Plan Implementation

Does the proposed action occur within either the California Klamath or California Cascades

Physiographic Zones of the Northwest Forest Plan?

(X) Yes () No

The project occurs within the California Klamath Physiographic Zone of the Northwest Forest Plan.

- 1.A. Projects that comply with the Pechman Exemption(Attachment 1).

  Does the proposed action meet an existing exemption category (2006 Pechman Exemption)

  ()Yes (X) No
- 1.B. Projects that Comply With the 2001 Survey and Manage Record of Decision and Plan Amendment with Subsequent ASRs except for the Red Tree Vole (Attachment 1).

  The project area has been examined for the three required survey criteria, which include 1. Does the project area occur within the range of the species?

  () Yes (X) No

Comments: Several species of Survey and Manage species are potentially found within the Carr Fire perimeter. In Shasta County the potential animal species are Shasta Salamander

(Hydromantes Shastae), Wintu Sideband (Monadenia troglodytes wintu), Shasta Sideband (Monadenia troglodytes troglodytes), Blue Gray Taildropper (Prophysaon coeruleum), Shasta Chaparral (Trilobopsis roperi), and Shasta Hesperian (Vespericola Shasta). In Trinity County the potential species are Trinity Shoulderband (Helminthoglypta talmadgei), Blue Gray Taildropper, and Big Bar Hesperian (Vespericola pressleyi).

Several species of vascular and non-vascular plant species have ranges which overlap with the Carr fire area including: Stalked orange peel (Sowerbyella rhenana), Northern moon shrub (Dedriscocaulon intricatulum), Leafy liverwort (Ptilidium californicum), Green bug moss (buxbaumia viridis), Clustered lady's-slipper (Cypripedium fasciculatum), and Mountain lady's-slipper (Cypripedium montanum).

# 2. Does the project contain suitable habitat (X)Yes () No

Comments: There is suitable habitat for all of these species within the Carr fire perimeter. The primary habitat for the animal species are either limestone and talus, or moist forest and seeps and springs.

The primary habitat for the plant species is dense, old forest with high canopy closure and abundant duff and litter. This type of habitat exists within the Carr fire perimeter, but was significantly degraded in many places because of the fire effects on vegetation characteristics.

# 3. Does the project negatively affect the species or habitat? () Yes (X) No

Comments: None of the animal species would be adversely impacted by the activities proposed in this CX. Shasta Salamander, Trinity Shoulderband, Wintu Sideband, Shasta Chaparral are found in limestone outcrops and talus slopes. Blue Gray Taildropper and Big Bar Hesperian are found in moist forests and near seeps and springs. These habitats would not be affected by the activities in this project.

Habitat for the plant species was significantly degraded in the Carr Fire area due to the fire. Additionally, work covered in this CX would primarily occur on established roads, trails, and other infrastructure and would be extremely limited in ground disturbance. Therefore, no plant species are expected to be adversely impacted by the activities proposed in this CX.

# 2. Aquatic Conservation Strategy (ACS) Compliance

Will the proposed action prevent or retard attainment of any of the ACS objectives, below, in the long term at both the site and watershed level.

() Yes (X) No

- 1. The Proposed Action would maintain or have no effect upon the distribution, diversity, and complexity of watershed and landscape-scale features to ensure protection of the aquatic systems to which species, populations, and communities are uniquely adapted.
- 2. The Proposed Action would maintain or have no effect upon the spatial and temporal connectivity within and between watersheds.
- 3. The Proposed Action would maintain or have no effect upon the physical integrity of the aquatic system.
- 4. The Proposed Action would maintain or have no effect upon water quality necessary to

support healthy riparian, aquatic, and wetland ecosystems.

- 5. The Proposed Action would maintain or have no effect upon the sediment regime under which this aquatic ecosystem evolved.
- 6. The Proposed Action would maintain or have no effect upon in-stream flows.
- 7. The Proposed Action would maintain or have no effect upon the timing, variability, and duration of floodplain inundation and water table elevation in meadows and wetlands.
- 8. The Proposed Action would maintain or have no effect upon species composition and structural diversity of plant communities in riparian areas and wetlands.
- 9. The Proposed Action would maintain or have no effect upon habitat which supports well-distributed populations of native plant, invertebrate and vertebrate riparian-dependent species.

The proposed project will have no effect on ACS compliance and will not prevent or retard attainment of any of the ACS objectives listed above.

Field Manager

**Redding Field Office** 

9/21/18 Date

